

1 UNITED STATES BANKRUPTCY COURT  
2 NORTHERN DISTRICT OF CALIFORNIA  
3 SAN FRANCISCO DIVISION

4 In re:

5 PG&E CORPORATION

6 - and -

7 PACIFIC GAS AND ELECTRIC  
8 COMPANY,

9 Debtors.

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11  
(Lead Case)  
(Jointly Administered)

**DECLARATION OF GUY L. WATTS II  
IN OPPOSITION TO  
DECLARATION OF JEREMIAH F.  
HALLISEY, ESQ. IN SUPPORT OF  
JOINDER OF CERTAIN FIRE VICTIMS  
IN WILLIAM B. ABRAMS MOTION TO  
DESIGNATE IMPROPERLY  
SOLICITED VOTES PURSUANT TO 11  
U.S.C. §1125(B) AND 1126(E) AND  
BANKRUPTCY RULE 2019**

- 12 ☐ Affects PG&E Corporation  
13 ☐ Affects Pacific Gas and Electric Company  
14 ☒ Affects both Debtors

15 \* All papers shall be filed in the Lead Case,  
16 No. 19-30088 (DM).

Date: May 12, 2020  
Time: 10:00 a.m. (Pacific Time)  
Place: United States Bankruptcy Court  
Courtroom 17, 16th Floor  
450 Golden Gate Avenue  
San Francisco, CA 94102

Re: Docket No. 6799, 6964, 6963

17  
18 **DECLARATION OF GUY L. WATTS II**

19 GUY L. WATTS II declares the following pursuant to 28 U.S.C. § 1746:

20 1. I am an attorney with Watts Guerra LLP. I have been working on the PG&E  
21 litigation for over two years. As part of the Individual Plaintiffs' Steering Committee for the 2017  
22 North Bay Fires, I worked extensively on the Tubbs Fire.

23 2. Additionally, I engage in daily conversations with Watts Guerra clients to address a  
24 variety of concerns.

25 3. On March 6, 2020, I was asked by a member of our firm to contact client Debbie  
26 Pool, who had asked to speak with a lawyer. On March 6, 2020, I left a voice message on Ms.  
27 Pool's mobile phone. This message did not solicit or even mention a vote of PG&E's reorganization  
28

1 plan.

2 4. On March 9, 2020 I spoke with Ms. Pool. I vividly recall my conversation with Ms.  
3 Pool, because after addressing several of her concerns, Ms. Pool thanked me for my work and for  
4 spending so much time on the phone with her (I looked at my office phone and noted a 51-minute  
5 call).  
6

7 5. Before hanging up, I confirmed with Ms. Pool that she wanted us to continue  
8 working on her behalf. She said she did, so I told her I would send an email to her, confirming her  
9 desire for us to continue her representation and providing her contact information for other  
10 members of our team who could help with any future questions.

11 6. After the call, on March 9, 2020 at 12:55 pm, I emailed Ms. Pool, referencing our  
12 call, confirming our continued representation, and introducing her to other members of our team.  
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14 7. Thereafter, I received an email from Ms. Pool asking that we end our representation  
15 of her. I then copied my assistant, and advised Ms. Pool that we would be closing her file.

16 8. Our firm's correspondence concerning the termination of our attorney-client  
17 relationship with Ms. Pool occurred on April 6, 2020.

18 9. I declare under penalty of perjury under the laws of the United States and the State  
19 of California that the forgoing is true and correct and executed this 12th<sup>th</sup> day of May 2020.  
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21 /s/ Guy L. Watts II  
22 Guy L. Watts II  
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